

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

1) TIM BLEYTHING; and,)	
2) JAMIE BLEYTHING,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 5:23-cv-00764-PRW
)	
3) NORTH AMERICAN VAN LINE, INC.)	
4) A-1 FREEMAN MOVING &)	
STORAGE, LLC.,)	
)	
Defendants.)	

**PLAINTIFFS' UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE A RESPONSE TO DEFENDANTS'
MOTION TO DISMISS AND BRIEF IN SUPPORT**

COMES NOW, Plaintiffs, Tim Bleything and Jamie Bleything (“the Bleything”), and respectfully move the Court to allow them an additional ten (10) days, or until October 9, 2023, within which to respond to the Motion to Dismiss Plaintiffs’ Complaint and Brief in Support [Doc. 6] filed by Defendants, North American Van Line, Inc. and A-1 Freeman Moving & Storage, LLC (“Defendants”), on September 6, 2023. The undersigned counsel is authorized to state that Defendants do not object to the relief sought herein. In further support of this Unopposed Motion, the Bleythings state as follows:

1. On September 6, 2023, the Defendants filed their pending Motion to Dismiss [Doc. 6]. The Bleythings’ response is due on September 27, 2023.

2. Plaintiffs undersigned attorney has been preparing for a jury trial that begins on September 25, 2023 and is scheduled to last all week in Bartlesville, Oklahoma (Washington County). As such, the Bleythings request an additional ten (10) days, or until October 9, 2023, within which to respond to Defendants’ Motion to Dismiss.

3. As required by LCvR 7.2, the undersigned advises the Court that the relief requested herein will not impact the case in any way since there is no Scheduling Order in place.

4. Counsel for Defendants has no objection to the Bleythings being given an additional ten (10) days, or until October 9, 2023, within which to respond to Defendants' pending Motion to Dismiss [Doc. 6].

5. Again, the Bleythings' counsel has asked for only that amount of time which he believes should be sufficient to adequately respond to Defendants' pending motion.

6. Allowing additional time will not pose any risk of delay to these proceedings.

7. A proposed Order will be submitted to the Court, pursuant to the ECF Policy Manual as required under LCvR 7.2.

Respectfully submitted,

s/Alan W. Bardell

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*Attorneys for Plaintiffs, Tim Bleything and
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CERTIFICATE OF SERVICE

I certify on September 21, 2023, a true and correct copy of the above and foregoing was transmitted via the ECF filing system to:

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s/ Alan W. Bardell

Alan W. Bardell